

**EXHIBIT I**

OFFICE OF THE UNITED STATES TRUSTEE  
FOR THE DISTRICT OF NEW JERSEY

IN RE:

LTL MANAGEMENT LLC

No. 21-30589 (MBK)

Debtor.

VIDEOTAPED DEPOSITION OF THIBAUT MONGON,  
produced, sworn, and examined on behalf of the  
Talc Creditor Committee, January 19, 2022,  
between the hours of 9:02 a.m. EST and 5:51 p.m.  
EST of that day, before Cheryl L. Sandeck, L.  
Certified Shorthand Reporter.

A P P E A R A N C E S:

APPEARING VIRTUALLY: New Jersey Action  
Insurers was represented by Ms. Wallis Granat of  
the law firm of Mendes & Mount, LLP, 750 7th  
Avenue, New York, NY 10019.

APPEARING VIRTUALLY: The Talc Creditor  
Committee was represented by Mr. John A.  
Bougiamas, as Co-Counsel, of Otterbourg PC,  
230 Park Avenue, New York, NY 10169.

APPEARING VIRTUALLY: The Talc Creditor  
Committee was represented by Mr. Brian A.  
Glasser and Ms. Cary Joshi of the law firm of  
Bailey Glasser, LLP, 1055 Thomas Jefferson  
Street NW, Suite 540, Washington, DC 20007.

1 Do you see that on the screen?

2 **A. Uh-huh.**

3 Q. Yes?

4 **A. Yes, I can see it.**

5 Q. And you can go through the whole  
6 document. If I put "profit," we can see profit,  
7 PROFI is mentioned 12 times -- you know, let's  
8 see profits. Profit.

9 If I put "revenue," you see there is  
10 four times revenue comes up?

11 **A. Uh-huh.**

12 Q. Revenue growth, do you see that?

13 **A. Yeah.**

14 Q. Okay. So if I put "talc" in, I don't  
15 see any results or "litigation." And you can  
16 just read the whole document or if you are  
17 comfortable answering the question, isn't that  
18 true that in your September 2021 conference  
19 statement that we can see here -- and we even  
20 have a button that we can press to hear your  
21 voice -- you don't mention to the investors any  
22 litigation costs or expenses, right?

23 **A. No. When I present the Consumer Health**  
24 **sector at this conference or in earnings call, I**  
25 **always refer to the operational performance of**

1 the business which is what I'm responsible for.  
2 I never reference the impact of litigation on --  
3 on the business.

4 Q. Okay. As someone who is on the  
5 Johnson & Johnson executive committee, have you  
6 ever heard anyone at Johnson & Johnson either  
7 internally or publicly say that litigation  
8 expenses were causing Johnson & Johnson's  
9 consumer sector to have financial problems?

10 MS. BROWN: Objection, asked and answered.

11 THE WITNESS: That's not how we talk about  
12 it. We talk about litigation. That is part of  
13 it, to make sure that it's very clear for  
14 everyone, investors and others, what is very  
15 clear about what is the exposure of Johnson &  
16 Johnson in terms of litigation and we review the  
17 different types of litigation that impact the  
18 different businesses of Johnson & Johnson.

19 And then we talk separately about the  
20 underlying operational performance of each  
21 sector. That allows the public and investors to  
22 really understand what is the impact of  
23 litigation specifically and what is the  
24 underlying performance of the business. And  
25 then they can draw their own conclusions about